

Erica A. Barker
Secretary
Postal Regulatory Commission
901 New York Avenue NW
Suite 200
Washington, D.C. 20268

Dear Secretary Barker,

The Postal Regulatory Commission's Proposed Rule, "Service Performance and Customer Satisfaction Reporting", seeks to "improve transparency, promote accountability, provide actionable data" of postal service delivery days categorized by region and ZIP code as well as by the type of mail.¹ It is within the Postal Regulatory Commission's authority to make changes to Postal service reporting, as these changes sit within their duty to serve the public interest to maintain an efficient and effective postal service.

We agree that the collection and reporting of postal service performance information that is available for the public to review will help increase transparency for users, and promote accountability for postal workers. Posting this information on a weekly basis on a dashboard will also help the Postal Regulatory Commission to determine certain regions, ZIP codes, and/or types of mail that need more attention from the Commission and local offices to improve service.

After the COVID-19 pandemic increased the demand for mail-in ballots² and delivery of COVID-19 tests³ as mandated by the federal government, it is especially important that the Postal Service's performance is maintained and even improved. COVID-19 will continue to exist in our country, and it is possible that another round of tests or protective equipment may need to be made available to the public by the federal government. In addition, many state and local governments hold elections and midterm elections for members of Congress occur this November. Voters across the country signed up for mail-in ballots to reduce their risk of exposure to COVID-19, as well as to reduce barriers to access voting facilities, especially for elderly and disabled people and military families.

The proposed changes by the Postal Regulatory Commission to report metrics like the actual delivery days, percent mail delivered within 1, 2, and 3 days of service standard, and data on on-time performance failures, can help users understand and estimate the delivery dates of their mail based on their ZIP code, and find problem areas for the Postal Service to increase capacity or address an issue. Furthermore, reporting this data at several levels - region, division and national, on a quarterly and annual basis, can help track progress over time, and categorizing the mail with distinctions for election/political mail, reply mail and non-profit mail can better inform users and the Postal Regulatory Commission of improvement areas.

¹ Proposal at 59364

² <https://www.pewresearch.org/fact-tank/2020/10/13/mail-in-voting-became-much-more-common-in-2020-primaries-as-covid-19-spread/>

³ <https://faq.usps.com/s/article/At-Home-COVID-19-Test-Kits>

The continuation of the audit program will ensure that the information reported is reviewed by a third party, which will increase the accuracy of information and consistency of reporting standards over time. Another change includes updates to terminology used in previous regulations, which is necessary for efficiency of the postal service. The proposed rule also includes the requirement to round percentages to one decimal place, which should make it easier for users to understand and for postal offices and regulators to report and audit.

Overall, it is our view that the changes included in the Postal Regulatory Commission's Proposed Rule, "Service Performance and Customer Satisfaction Reporting" will improve the performance of mail delivery and increase the transparency and accountability of our mail delivery service for users and Postal leadership.

Thank you for the opportunity to comment on the Postal Regulatory Commissions' Proposed Rule.

Respectfully Submitted,

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